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September 6, 2023

Midland Credit Management, Inc.  
Attention: Brian C. Nicholas, Esquire  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106

Also By Email: bnicholas@kmllawgroup.com

Re: RE: Maranda Grasley SSN: xxx-xx-6268 DOB: xx/xx/yyyy Chapter  
13 Bankruptcy Case No. 22-02354, U.S. Bankruptcy Court, Middle District of PA Proof of Claim  
# 4 Alleged Original Creditor: Comenity Capital Bank / Big Lots  
Last 4 Digits of Account No. 5892 Alleged Balance \$850.11

## **DISPUTE AND REQUEST FOR PRODUCTION OF DOCUMENTS**

Dear Attorney Nicholas,

Once again, please be advised that I represent Maranda Grasley, Debtor in the above captioned Chapter 13 Bankruptcy. Recently your client Midland Credit Management, Inc. filed an amended Proof of Claim (POC) in Ms. Grasley's Chapter 13 Bankruptcy case.

Ms. Grasley is not disputing that she had Comenity Capital / Big Lots account. But she is disputing the amount of the alleged balance. She is also disputing whether Midland Credit Management, Inc. has standing to file the POC.

Please provide the following documents:

- 1) All evidence showing the date that the purported governing contract was sent to the Debtor and by what means, to what address.
- 2) All documents related to the chain of assignment.
- 3) All documents referenced or mentioned in the “BILL OF SALE.”

**PLEASE ALLOW THIS LETTER TO SERVE AS NOTICE THAT MS. GRASLEY DISPUTES THE ABOVE REFERENCED ACCOUNT FOR THE ABOVE STATED REASONS PURSUANT TO THE FAIR CREDIT REPORTING ACT, 15 USC 1681 ET. SEQ.**

Sincerely,  
**Vicki Piontek**  
Vicki Piontek, Esquire